

A CRITICAL OVERVIEW OF
THE BEST PRACTICES GUIDE

SBT AVERS THAT THE *BEST PRACTICES GUIDE* (BPG) FAILS TO PROVIDE A COMPREHENSIVE GUIDELINE FOR THE TIMELY AND EFFECTIVE RESOLUTION OF INTERFERENCE ISSUES, INSTEAD PROVIDING NOTHING MORE THAN A SERIES OF LOOSELY WORDED SUGGESTIONS OSTENSIBLY AIMED AT RESOLVING INTERFERENCE AT SOME UNDEFINED FUTURE DATE. THESE SUGGESTIONS PROVIDE NO GUIDANCE OR DIRECTIVE REGARDING ALLOCATION OF THE COSTS INVOLVED IN SOLVING THE INTERFERENCE PROBLEMS, RESOLUTION TIME FRAME, ASSESSMENT OF RESPONSIBILITY FOR RESOLUTION, METHOD OF TESTING, RESOLUTION OF DISPUTED FINDINGS, AND OTHER ISSUES. RELIANCE ON THE 'SYSTEM' ESPOUSED IN THE BPG AS THE SOLUTION TO INTERFERENCE RESOLUTION THROUGH CODIFICATION OF THE BPG WOULD SIMPLY MAINTAIN THE *STATUS QUO* BY ALLOWING INTERFERENCE TO CONTINUE FOR LONG PERIODS AFTER THE PROBLEM HAS ARISEN AND FAILING TO CLEARLY IDENTITY OF THE PARTY RESPONSIBLE FOR SOLVING THE PROBLEM. IF THE COMMISSION IS TO CODIFY AN INTERFERENCE RESOLUTION MECHANISM, IT MUST PROVIDE A LEVEL OF DETAIL AND A FINITE PROCEDURE THAT ARE ENTIRELY ABSENT FROM THE BPG.

THE BPG ESSENTIALLY CREATES NO MORE THAN AN AMORPHOUS TWO STEP PROCESS FOR INTERFERENCE RESOLUTION. STEP ONE CONSISTS OF DETERMINING WHO IS CAUSING THE INTERFERENCE; STEP TWO CONSISTS OF FIXING THE PROBLEM, AND SUGGESTIONS FOR RESOLUTION ARE OFFERED. ANY SERIOUS EFFORT AT RESOLVING INTERFERENCE MUST BE FAR MORE AMBITIOUS AND SYSTEMATIC THAN THE BPG. THE NUMEROUS SHORT-COMINGS OF THE BPG, IN PRACTICAL APPLICATION ARE EASY TO IDENTIFY. THE BPG'S FIRST SUBSTANTIVE SUGGESTION FOR THE RESOLUTION OF INTERFERENCE IS FOR THE ENTITY RECEIVING INTERFERENCE TO DETERMINE WHO IS CAUSING SUCH INTERFERENCE: "[THE ENTITY RECEIVING INTERFERENCE] SHOULD CONTACT THE CMRS CARRIERS OPERATING IN THE AFFECTED AREA." *BEST PRACTICES GUIDE* AT V. A. IN A PERFECT WORLD, THIS SUGGESTION MAY PROVE EFFECTIVE, BUT IN REALITY THIS TASK IN AND OF ITSELF IS BOTH AN UNWIELDY BURDEN AND AN EXTREME IMPEDIMENT TO THE TIMELY RESOLUTION OF THE INTERFERENCE PROBLEM. THE BURDEN OF DETERMINING WHO IS CAUSING THE INTERFERENCE IS CUMBERSOME AS THERE ARE BOUND TO BE NUMEROUS CMRS CARRIERS OPERATING IN CLOSE PROXIMITY TO ANY PLACE AT WHICH INTERFERENCE IS RECEIVED. THIS IS THE CASE BOTH BECAUSE OF THE TENDENCY FOR ENTITIES TO CO-LOCATE TRANSMITTERS ON THE SAME TOWERS, AND DUE TO THE PROLIFERATION OF CMRS CARRIERS IN THE MARKET TODAY.

THE TASK OF IDENTIFYING THE INTERFERING PARTY IS FURTHER COMPLICATED BY THE FACT THAT EA AND BEA LICENSEES ARE NOT REQUIRED TO REGISTER THEIR TRANSMISSION SITES WITH THE COMMISSION; AND THEREFORE, A PARTY RECEIVING INTERFERENCE MAY BE ENTIRELY UNABLE TO DETERMINE THE SOURCE EVEN BY REFERENCING THE COMMISSION'S RECORDS. WITH NO WAY TO IDENTIFY THE SOURCE OF THE INTERFERENCE WITH ANY CERTAINTY, THE VICTIMS OF INTERFERENCE MAY REMAIN STUCK AT THE BPG'S FIRST STEP FOR AN UNREASONABLE PERIOD OF TIME. CONFRONTED WITH THIS DEARTH OF INFORMATION, UNDER THE SYSTEM PROPOSED BY THE BPG, AN ENTITY MAY FIND ITSELF CALLING ALL CMRS CARRIERS IN THE NATION WITH LITTLE MORE THAN AN ADDRESS OR LOCATION AND AN INQUIRY REGARDING WHETHER THE CARRIER BELIEVES IT IS THE SOURCE OF THE PROBLEM. SUCH CALLS ARE UNLIKELY TO ELICIT A GREAT DEAL OF COOPERATION, AND SUCH INFORMATION AS IS AVAILABLE WILL IN MOST INSTANCES BE INSUFFICIENT TO IDENTIFY THE SOURCE OF INTERFERENCE. FOR THESE REASONS, THE BPG'S

CONCEPT OF PLACING THE BURDEN OF IDENTIFYING THE INTERFERING PARTY ON THE PARTY RECEIVING INTERFERENCE IS MISGUIDED. SUCH A TASK SHOULD BE HANDLED BY AN ENTITY THAT IS ADEPT AT SUCH TASKS AND CAPABLE OF GLEANING FROM THE AVAILABLE INFORMATION THE ENTITIES MOST LIKELY CAUSING SUCH INTERFERENCE. FURTHERMORE, THE SBT STRONGLY AVERS THAT IT IS ESSENTIAL THAT ALL TRANSMISSION SITES BE REGISTERED WITH SOME ENTITY REGARDLESS OF THE TYPE OF LICENSE THEY ARE ASSOCIATED WITH. THE VALUE OF HAVING ALL SUCH INFORMATION ON RECORD FAR OUTWEIGHS ANY BURDEN CREATED BY SUCH AN OBLIGATION.

THE BPG'S SECOND STEP TOWARDS INTERFERENCE RESOLUTION IS THE SUGGESTION THAT ENTITIES RECEIVING INTERFERENCE SHOULD COOPERATE IN TESTING TO DETERMINE THE CAUSE AND EXTENT OF THE INTERFERENCE RECEIVED, AND "SHOULD COOPERATE TO DETERMINE THE MOST EFFICIENT ALLOCATION OF COSTS AND RESOURCES NECESSARY FOR INTERFERENCE MITIGATION, TAKING INTO ACCOUNT THE COSTS AND BENEFITS OF MITIGATIVE ACTIONS." BEST PRACTICES GUIDE AT V.A. WHILE UNDOUBTEDLY, SUCH COOPERATION MUST OCCUR, THE BPG PROVIDES NO SOLUTION FOR INTERIM STEPS TO RESOLVE SUCH INTERFERENCE, AND CERTAINLY NO IMMEDIATE RELIEF. FIREMEN IN A BURNING BUILDING, POLICE OFFICERS CLEARING THE SITE OF A BOMB THREAT, AND AN AMBULANCE SQUAD CALLING A HOSPITAL FOR INSTRUCTIONS REGARDING AN IMMOVABLE PATIENT ARE IN NEED OF IMMEDIATE RESOLUTION OF THE INTERFERENCE PROBLEMS FACING THEM. THEY REQUIRE THE ABILITY TO HAVE THE INTERFERENCE ADDRESSED WHILE THEY CONDUCT THEIR WORK, NOT TO HAVE THE INTERFERENCE ADDRESSED FOLLOWING SEVERAL MONTHS OF TESTING AND NEGOTIATION. THE BPG DOES NOT ADDRESS EMERGENCY SITUATIONS AND THEREFORE RISKS THE LIVES OF PUBLIC SAFETY PERSONNEL AND THE CITIZENS OF THIS NATION NEEDLESSLY. CASES OF INTERFERENCE TO PUBLIC SAFETY ENTITIES CAN AND SHOULD BE ADDRESSED IMMEDIATELY, AND PERMANENTLY SOLVED WHEN TIME PERMITS. FURTHERMORE, DISPATCH SERVICE PROVIDERS SHOULD HAVE SOME IMMEDIATE RECOURSE FOR THEIR INTERFERENCE PROBLEMS WHEN SUCH PROBLEMS THREATEN THEIR BUSINESS, AND CERTAINLY WHEN THEY MAY THREATEN LIFE OR PROPERTY. NO LICENSEE SHOULD CONSIDER ITS FCC LICENSE AN AUTHORIZATION TO INTERFERE, AND ANY UNWILLINGNESS TO IMMEDIATELY ADDRESS INTERFERENCE CAUSED TO OTHER SYSTEMS IS INDICATIVE OF SUCH A PRESUMPTION ON THE PART OF A LICENSEE. INSOFAR AS THE BPG OFFERS NO SUCH MEANS OF IMMEDIATE RESOLUTION OF INTERFERENCE COMPLAINS, THE BPG OFFERS LITTLE SUBSTANTIVE RELIEF FROM INTERFERENCE.

TO ASSIST THE PARTIES IN THEIR NEGOTIATION OF THE PROPER MEANS OF RESOLVING THE IDENTIFIED INTERFERENCE PROBLEM, THE BPG OFFERS A LIST OF SUGGESTED APPROACHES TO INTERFERENCE RESOLUTION. THE SUGGESTED APPROACHES ARE RETUNING CMRS CHANNELS FURTHER AWAY FROM PUBLIC SAFETY OPERATOR'S CHANNELS, MODIFYING CMRS POWER LEVELS, ANTENNA HEIGHT AND ANTENNA CHARACTERISTICS, ASSURING PROPER OPERATION OF BASE STATION EQUIPMENT, IMPROVING LOCAL SIGNAL STRENGTH OF PUBLIC SAFETY COMMUNICATIONS, AND THE INCORPORATION OF FILTERS INTO CMRS SYSTEMS. BEST PRACTICES GUIDE V.A. 1 & 2. WHILE ITS LIST OF SUGGESTED RESOLUTIONS IS FAIRLY COMPREHENSIVE, THE BPG OFFERS NO HIERARCHY OF SOLUTIONS. IN FAILING TO RANK THE SUGGESTED RESOLUTIONS IN ANY ORDER OR PROVIDE A SYSTEM FOR SELECTING A RESOLUTION METHOD WHEN A DISPUTE BETWEEN

METHODS EXISTS, ADHERENCE TO THE BPG COULD RESULT IN AN UNDUE AMOUNT OF TIME LOST WHILE THE PARTIES NEGOTIATE BETWEEN VARIOUS RESOLUTION OPTIONS. THIS NEGOTIATION MAY BE ONE SIDED AS THE PARTY RECEIVING INTERFERENCE MAY NOT HAVE SUFFICIENT MEANS TO PARTICIPATE MEANINGFULLY IN THE PROCESS OR AFFORD ANY SOLUTION INVOLVING CHANGES TO THEIR SYSTEMS.

THE AFFORDABILITY OF THE SUGGESTIONS PROFFERED IN THE BPG ARE THEMSELVES SUBJECT TO OBJECTION. IT IS THE POSITION OF THE SBT THAT THE SUGGESTIONS THAT CMRS CARRIERS ALTER THEIR SYSTEM TO PROTECT OTHER OPERATORS ARE FULLY ACCEPTABLE. ON THE OTHER HAND, THE SUGGESTION THAT THE ENTITIES RECEIVING INTERFERENCE OBTAIN NEW EQUIPMENT, ADD BASE STATIONS WITHIN THEIR CONTOURS, OR OTHERWISE MODIFY THEIR SYSTEM ARE UNDULY PUNITIVE. ADDING BASE STATIONS, IN MOST INSTANCES, IS A TREMENDOUS EXPENSE THAT MANY PUBLIC SAFETY AND DISPATCH ENTITIES SIMPLY CANNOT ENDURE. SUCH A SOLUTION ALSO IGNORES THE FACT THAT THESE ENTITIES ARE THE VICTIMS OF INTERFERENCE, NOT THE SOURCE. EVEN HANDED REMEDIATION OF INTERFERENCE ISSUES SHOULD APPROPRIATELY FOCUS ON MAKING CHANGES TO THE INTERFERING SYSTEM AS THAT SYSTEM IS CAUSING THE PROBLEM, AND THUS IS VIOLATING THE COMMISSION'S RULES AGAINST CAUSING HARMFUL INTERFERENCE. SHOULD THE COMMISSION ADOPT TECHNICAL SOLUTIONS AS A RESULT OF THE NPRM, SUCH SOLUTIONS WILL UNDOUBTEDLY INVOLVE A FUNDING MECHANISM FOR AFFECTING SUCH CHANGE, BUT THE BPG OFFERS NO SUCH MECHANISM AND FAILS ENTIRELY TO ADDRESS THE AFFORDABILITY OF THE SUGGESTED INTERFERENCE SOLUTIONS. THE FAILURE TO CONTEMPLATE MONETARY CONSIDERATIONS MAKES THE BPG IMPRACTICABLE AT BEST AND PUNITIVE AT WORST.

UNFORTUNATELY, THE BPG'S APPROACH AMOUNTS TO LITTLE MORE THAN DIRECTING AN AGGRIEVED PARTY TO PICK UP THE PHONE BOOK AND CALL AROUND TO FIGURE OUT 'WHO DONE IT,' FOLLOWED BY THE SUGGESTION THAT THE PARTY PARTICIPATE IN FIGURING OUT HOW TO FIX THE PROBLEM. WHILE IT IS NOT THE INTENTION OF THE SBT TO UNDULY CRITICIZE THE EFFORT OF THOSE PARTIES THAT PARTICIPATED IN DRAFTING THE BPG, THE SBT NOTE THAT THE BPG DOES NOTHING MORE THAN STATE THE OBVIOUS WITHOUT PROVIDING ANY FRAMEWORK FOR DETERMINING EITHER A TEMPORARY OR PERMANENT SOLUTION. THE COMMISSION'S RULES IN FEW, IF ANY, INSTANCES DEAL IN VAGUE SUGGESTIONS OR GUIDELINES, AND THERE IS NO REASON FOR SUCH TO BE THE CASE WITH INTERFERENCE RESOLUTION. THE BPG PROVIDES NO TIME FRAME FOR INTERFERENCE RESOLUTION, IT PROVIDES NO ASSESSMENT FOR EXPENSES TO THE PARTY RECEIVING INTERFERENCE, IT PROVIDES NO STRICT GUIDELINES FOR DETERMINING HOW TO RESOLVE THE SITUATION, AND IT PROVIDES NO HIERARCHY OF PREFERENCE AMONG POSSIBLE RESOLUTIONS. IN ESSENCE, THE BPG PROVIDES NO GREATER GUIDANCE REGARDING INTERFERENCE RESOLUTION THAN DO THE COMMISSION'S RULES AS CURRENTLY CONSTITUTED.

AMONGST THE MOST GLARING SHORT-COMINGS OF THE BPG IS THAT IT ADDRESSES ITSELF EXCLUSIVELY TO INTERFERENCE TO PUBLIC SAFETY SYSTEMS. WHILE IT IS UNDENIABLE THAT INTERFERENCE TO PUBLIC SAFETY SYSTEMS OFTEN HAS HIGHER STAKES INVOLVED THAN DOES INTERFERENCE TO COMMERCIAL AND PMRS SYSTEMS, THERE IS NO REASON TO SET UP AN INTERFERENCE GUIDELINE

THAT REFERENCES ONLY PUBLIC SAFETY INTERFERENCE. AMONG THE REASONS PUBLIC SAFETY SYSTEMS RECEIVE INTERFERENCE IS THE ANALOG EQUIPMENT COMMONLY UTILIZED IN SUCH SYSTEMS. THIS EQUIPMENT IS FUNCTIONALLY IDENTICAL TO THE EQUIPMENT USED BY THOUSANDS OF CMRS AND PMRS DISPATCH OPERATORS. IN FACT, NUMEROUS PUBLIC SAFETY ENTITIES RELY ON DISPATCH SERVICE RECEIVED FROM CMRS AND PMRS OPERATORS DUE TO THE AFFORDABILITY, PROLIFERATION AND AVAILABILITY OF SUCH SERVICE. THUS, THE OPPORTUNITY EXISTS TO OFFER INTERFERENCE SOLUTIONS FOR A FAR BROADER GROUP OF LICENSEES THAN IS THE FOCUS OF THE BPG. BY FOCUSING ON THE TYPES OF OPERATION THAT TENDS TO CAUSE INTERFERENCE AND THE TYPE OF EQUIPMENT THAT TENDS TO SUFFER FROM INTERFERENCE IT IS POSSIBLE TO OFFER INTERFERENCE RESOLUTION TO MOST LICENSEES RATHER THAN AN INSULAR SEGMENT OF LICENSEES.

IT IS ALSO IMPORTANT TO NOTE THAT THE INDIVIDUAL RECEIVING INTERFERENCE MAY NOT BE ABLE TO DETERMINE THE EXTENT OF SUCH INTERFERENCE, DETERMINE WHERE IT OCCURRED, HOW LONG IT PERSISTED, WHAT CHARACTERISTICS IT EXHIBITED, ETC. THE FACT IS THAT PUBLIC SAFETY PERSONNEL OR CUSTOMERS OF DISPATCH SYSTEMS ARE NOT THE PARTIES BEST SUITED TO DETERMINE WHO IS CAUSING THEM INTERFERENCE. SUCH A DETERMINATION SHOULD BE MADE BY AN ENTITY WITH RESOURCES DEVOTED TO SUCH MATTERS.

List of Commenting Parties

NEC America, Inc.	NEC	Carolina Power and Light Company/ TXU Business Services	Carolina Power
Access Spectrum, LLC	Access Spectrum	Cascade Two-Way Radio	Cascade
Ad Hoc Wireless Alliance	AHWA	Cellular Telecommunications & Internet Association	CTIA
Aeronautical Radio, Inc.	ARINC	Cinergy Corporation	Cinergy
Alltel Communications, Inc./ Cingular Wireless, Inc.	Alltel/Cingular	Cities of College City Texas, and Bryan Texas	College Station/ Bryan Austin
Ameren Corporation	Ameren	City of Austin	Austin
American Electronic Power Company, Inc.	AEP	City of Baltimore	Baltimore
American Mobile Telecommunications Association, Inc.	AMTA	City of Fort Lauderdale	Ft. Lauderdale
American Petroleum Institute	API	City of Gainesville	Gainesville
American Public Transportation Association	APTA	City of New York	NYC
American Radio Relay League, the National Association of Radio Operators	AARL	City of Portland	Portland
American Water Works Association	AWWA	Codington-Clark Electric Cooperative, Inc.	Codington-Clark Electric
Association of American Railroads	AAR	Commercial Radio and Television, Inc.	CRT
Association of Public-Safety Communications Officials International, Inc.*	APCO	Commonwealth of Virginia, Department of Information Technology	Virginia
AT&T Wireless Services, Inc.	AWS	Consumers Energy Company	Consumers
Avaya, Inc.	Avaya	Coupe Communications	Coupe
AVR, Inc.	AVR	Dallas Area Rapid Transit Authority	DART
Bergen County Police Department	Bergen County	Danny Hampton	Hampton
Blooston, Mordkofsky, Dickens, Duffy & Pendergast	Blooston	Delmarva Power & Light Company	Delmarva
Boeing Company	Boeing	Dennis Brown	Brown
Bosshard Radio Service	BRS	Department of Information Technology, Fairfax, VA	Fairfax
Business Autophones, Inc.	BAI	Dobson Communications Corporation	Dobson
		Duke Energy Corporation	Duke
		E.F. Johnson Company	E.F. Johnson
		East River Electric Power Cooperative, Inc.	East River

Eastman Chemical Company	Eastman	Kenwood Communications Corporation	Kenwood
Entergy Corporation and Entergy Services	Entergy	King County (Washington)	King County
Exelon Corporation	Exelon	Lockheed Martin Corporation	Lockheed Martin
Federal Express, Inc.	FedEx	Lubrizol Corporation	Lubrizol
FEM Electric Association, Inc.	FEM	M/A-Com, Inc., a division of Tyco Electronics	MA-Com
Fischer Wireless Services	Fischer	Marnell Corrao Associates	Marnell
Florida Power and Light	FPL	Maui County Metropolitan Transit Authority of Harris County	Maui
Focus 2000 Communications Forestry Conservation Communications Association	Focus	Metropolitan Utilities District/ Omaha Public Power District Motient Communications, Inc.	HC
Harmer Radio & Electronics, Inc.	Harmer	Motorola, Inc	MUD/OPPO
H-D Electric Cooperative, Inc.	H-D Electric	National Association of Counties*	Motient
Holy Cross Electric Association, Inc.	Holy Cross	National Association of Manufacturers	Motorola
Illinois Power Company	IPC	National Association of Telecommunications Officers and Advisors*	NACo
Intel Corporation	Intel	National League of Cities*	NAM
International Association of Chiefs of Police, Major Cities Chiefs Association, National Sherrif's Association, Major County Sherrif's Association	IACP/MCC/NSA/MCSA	National Ready Mix Concrete Association	NATOA
International Association of Fire Chiefs, Inc. & International Municipal Sign Association	IAFC/IMSA	National Rural Electric Cooperative Association	NLC
ISG Cleveland, Inc.	ISG	National Rural Telecommunications Cooperative	NRMCA
Island SMR	Island SMR	New Jersey Transit Authority	NRECA
Jones Onslow Electric Membership Corporation	Jones Onslow EMC	New York City Transit Authority	NRTC
Kankakee Valley Rural Electric Membership Corporation	KVREMC	Nextel Communications, Inc	NJ Transit
		Northern Electric Cooperative	NYCT
			Nextel
			Northern Electric

Office of the Chief Technology Officer, Government of the District of Columbia	DC	Society of Broadcast Engineers, Inc.	SBE
Ohio Multi Agency Radio Communications System	MARCS	Southeastern Electric Cooperative, Inc.	Southeastern Electric Southern
Pinnacle West Capital Corporation Preferred Communications Systems, Inc.	Pinnacle	Southern Linc Southwest	
Private Wireless Coalition	PCSI	Louisiana Electronic Membership Corporation	SLEMCO
Professional Communications Public Safety Improvement Coalition	PWC	Spectrum Clearing Alliance	SCA
Public Safety Wireless Network Program	PC	State of Arizona	Arizona
Qualcomm, Inc.	PSIC	State of Florida	Florida
RadioSoft		State of Hawaii	Hawaii
RCC Consultants, Inc		State of Maryland Department of Budget and Management Office of Technology	
Regional Communications System		Telecommunications Industry Association	Maryland
Renville Sibley Cooperative Power Association	PSWN	United States Cellular Corporation	TIA
Richard C. Nowakowski	Qualcomm RadioSoft	United Telcom Council	U.S. Cellular
San Francisco Bay Area Rapid Transit District	RCC	Utah Communications Agency Network	UTC
Satellite Industry Association	RCS	UTAM, Inc.	UCAN
Scana Corporation		UTStarcom, Inc.	UTAM
Shook, Hardy & Bacon, LLC	Renville-Sibley	Verizon Wireless	UTStarcom
Shulman, Rogers, Gandal, Pordy & Ecker, P.A.	Nowakowski	Washington Electric Membership Corporation	Verizon
Sid Richardson Energy Services Co.		Western Communications	Washington EMC
Skitronics, LLC	BART	White County Rural Electric Membership Corporation, Inc.	Western
SmartLink	SIA	Xcel Energy Services, Inc.	White County REMC
Snohomish County Emergency Radio System	Scana		Xcel
	Shook		
	Shulman		
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	SmartLink		
	SERS		

CERTIFICATE OF SERVICE

I, Jason Emala, hereby certify that on this 1st day of August, 2002, I caused a copy of the foregoing Reply Comments to be served by First Class U.S. Mail, postage prepaid, to the following:

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National Rural
Telecommunications Cooperative
c/o Steven T. Berman
2121 Cooperative Way
Herndon, VA 20171

International Association of Chiefs of Police
c/o William B. Berger, President
515 N. Washington Street
Alexandria, VA 22314-2357

Major Cities Chiefs Association
c/o Jerry Keller, President
Las Vegas Metro Police Dept.
400 Stewart Avenue
Las Vegas, NV 89101

National Sheriff's Association
c/o John Cary Bittick, President
1450 Duke Street
Alexandria, VA 22314

Telecommunications Industry Assoc.
c/o Grant E. Seiffert
1300 Penn. Ave., NW., Ste., 350
Washington, DC 20004

Society of Broadcast Engineers, Inc.
c/o Booth, Freret, Imlay & Tepper
5101 Wisconsin Avenue, NW
Suite 307
Birmingham, AL 35209

Lockheed Martin Corporation
c/o Gerald C. Musarra, Vice President
1725 Jefferson Davis Highway
Crystal Square 2 Suite 403
Arlington, VA 22314

Cellular Telecommunications &
Internet Association
c/o Michael F. Altschul
1250 Connecticut Ave., NW Ste., 800
Washington, DC 20036

The Forestry Conservation
Communications Association
c/o John Berst, President
Pennsylvania Bureau Forestry
PO Box 8552
Harrisburg, PA 17105

Major County Sheriffs' Association
c/o Kevin E. Beary, President
Orange County Sheriff's Office
2400 West 33rd Street
Orlando, FL 32839

National Association of Manufacturers
Arter Hadden, L.L.P.
1801 K Street, NW
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The National Assoc., for Amateur Radio
c/o Christopher D. Imaly
Booth Freret Imaly & Tepper, PC
5101 Wisconsin Avenue NW Ste 307
Washington, DC 2001

National Ready Mixed
Concrete Association
c/o Jennifer LeFevre
900 Spring Street
Silver Spring, MD 20910

Federal Express Corporation
c/o Nathan Lemmon and Richard Dunn
PO Box 727
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Intel Corporation
c/o Greg S. Slater, Senior Corp., Attorney
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c/o Mark W. Swanson, IT Manager
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Eastman Chemical Company
c/o Jerry B. Hale
PO Box 511
Kingsport, TN 37662

Aeronautical Radio Inc.
c/o John L. Bartlet
Wiley Rein & Fielding LLP
1776 K Street, NW
Washington, DC 20006

ISG - Cleveland, Inc.
c/o Frank Palazzolo, Project Manager
3100 East 45th Street
Cleveland, OH 44127

The American Petroleum Inst.
c/o Wayne V. Black
Keller and Heckerman, LLP
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Washington, DC 20001

American Water Works, Association
c/o Thomas W. Curtis
Deputy Executive Director
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Washington, DC 20005

Boeing Company
c/o David A. Nall
Squire Sanders & Dempsey L.L.P.
1201 Pennsylvania Avenue, N.W.
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Washington, DC 20044-0407

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Washington, DC 20006

Ameren Corporation
c/o Gerald Bednar
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St. Louis, MO 63166-6149

Florida Power & Light company
c/o Lourdes F. Sori
P.O. Box 029100
Miami, FL 33102-029100

Washington Electric Membership Corp.
c/o Robert Chapman
P.O. Box 598
Sandersville, GA 31082

Southeastern Electric Coop., Inc.
c/o Brad Schardin
P.O. Box 388
Marion, SD 57043

Renville Sibley Coop. Power Assoc.
c/o Dale Christensen, CEO
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Danube, MN 56230-0068

Delmarva Power & Light, *et al.*
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McDermott, Will & Emery
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Sid Richardson Energy Services Co.
c/o Weldon Wright
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Fort Worth, TX 76102

East River Electric Power Coop., Inc
c/o Jeffrey L. Nelson
P.O. Box 227
121 SE 1st Street
Madison, SD 57042

Pinnacle West Capital Corp.
c/o Denny L. Brown
P.O. Box 53999 - Mail Station 8878
Phoenix, AZ 85072

Excelon Corporation
c/o Michael S. Pabian
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Scana Corporation
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Duke Energy Corp.
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Metropolitan Transit Authority of
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Dallas Area Rapid Transit
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San Francisco Bay Area Rapid Transit Dist.
c/o James M. Dunn
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Forest Industries Telecommunications
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Eugene, OR 97401

Personal Communications Industry Assoc.
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Industrial Telecommunications Association, Inc.
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The City of Fort Lauderdale
c/o Mark Pallans
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Association of American Railroads
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50 F Street, NW
Washington, DC 20001

Preferred Communication Systems, Inc.
c/o Charles D. Gusky, Exec. VP
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5605 N. MacArthur Boulevard
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Access Spectrum, LLC
c/o Mark E. Crosby, President
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Bethesda, Maryland 20814

Motient Communications, Inc.
c/o Walter V. Purnell, Jr., President & CEO
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Reston, VA 20191-5416

Blooston, Mordkofsky, Dickens, Duffy
& Prendergast
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Island SMR, Inc.
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Fisher Wireless Services, Inc.
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Cascade Two Way Radio
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Seattle, WA 98115

Western Communications, Inc.
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The Ad Hoc Wireless Alliance
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Commercial Radio And Television, Inc.
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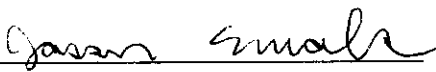
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